



this action is, therefore, timely under 28 U.S.C. § 1446(b).

4. Venue.

The United States District Court for the District of New Jersey is the district within which Plaintiff's state court action is currently pending.

5. Notice to State Court.

A copy of this Notice of Removal is being filed with the Clerk of the New Jersey Superior Court, Law Division, Sussex County.

6. Relief Requested.

Defendant requests that the United States District Court for the District of New Jersey assume jurisdiction over the above-captioned action and issue such further orders and processes as may be necessary to bring before it all parties necessary for the trial of this action.

EDWARDS ANGELL PALMER & DODGE LLP  
Attorneys for Defendant,  
Bank of America, N.A.

Dated: January 20, 2009

By: /s/ Ivan R. Novich  
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**PROOF OF SERVICE**

I am over the age of 18 and not a party to this action. On this date, I served a true copy of the attached:

**DEFENDANT BANK OF AMERICA, N.A.'S NOTICE OF REMOVAL OF ACTION  
UNDER 28 U.S.C. § 1441 (FEDERAL QUESTION)**

on each of the parties listed below by FedEx (overnight mail) to their attorneys of record at their last known addresses as follows:

John G. Lynch, Esq.  
40 Main Street  
Franklin, New Jersey 07416

Attorney for Plaintiff  
Nancy Valentine

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 20, 2009

/s/ Alison M. Furness  
Alison M. Furness